

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

SAMAN DHOJ KARKI,

Plaintiff,

Civil Action No.: 1:23-cv-00265

v.

**BANK OF AMERICA, N.A., COINBASE
INC., CRYPTO.COM and MOONPAY
USA LLC,**

Defendants.

**DEFENDANT COINBASE, INC.’S CONSENT MOTION FOR
EXTENSION OF TIME TO RESPOND TO THE COMPLAINT**

Defendant Coinbase Inc. (“Coinbase”), by counsel, pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), Local Civil Rule 7, and with the consent of Plaintiff Saman Dhoj Karki (“Plaintiff”, and collectively with Coinbase, the “Parties”), respectfully move the Court for an Order extending the time in which Coinbase may respond to Plaintiff’s Complaint (ECF No. 1), by twenty-one (21) days, by and through May 4, 2023. In support of this Motion, Coinbase states as follows.

1. Plaintiff filed the Complaint on February 27, 2023. *See* ECF No. 1.
2. On March 23, 2023 the Summons and Complaint were served on Coinbase. Coinbase agrees that service of the Summons and Complaint upon Coinbase was proper.
3. Coinbase’s response is currently due on April 13, 2023. The time for Coinbase to respond to the Complaint has not yet expired.

4. Coinbase desires additional time to review documentation and further evaluate the case in order to prepare an appropriate response, and to discuss with Plaintiff's counsel whether Plaintiff's claims against Coinbase are subject to binding arbitration. Specifically, Coinbase seeks an extension of twenty-one (21) days, by and through May 4, 2023, to respond to the Complaint.

5. Plaintiff consents to the relief being sought herein.

6. This Consent Motion is not being interposed for delay. Rather, the granting of this Consent Motion is in the interest of judicial economy and the efficient use of the Parties' respective resources.

7. Coinbase does not waive, and expressly reserves, its right to move to compel arbitration of Plaintiff's claims against Coinbase.

8. A proposed order granting the extension is being filed herewith.

WHEREFORE, Defendant Coinbase, Inc. respectfully requests that the Court grant this Consent Motion and extend the time for Coinbase to respond to the Complaint (ECF No. 1) by and through May 4, 2023.

Dated: April 11, 2023

Respectfully submitted,

COINBASE, INC.

By counsel:

/s/ Paul Gibson

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Counsel for Defendant Coinbase, Inc.

CERTIFICATE OF SERVICE

I certify that, on April 11, 2023, I filed a copy of the foregoing electronically with the Clerk of the Court using the Court's CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Paul Gibson

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